

Message

From: Brown, Christopher [Brown.Christopher.T@epa.gov]
Sent: 12/13/2022 11:18:12 PM
To: Lyles, Kat [Kat.Lyles@meritenergy.com]; Valliquette, Arlene [Arlene.Valliquette@meritenergy.com]
CC: Minter, Douglas [Minter.Douglas@epa.gov]; Bowling, Linda (she/her/hers) [Bowling.Linda@epa.gov]; Wiser, Nathan [Wiser.Nathan@epa.gov]; Wang, Gary [wang.gary@epa.gov]; Chin, Lucita [Chin.Lucita@epa.gov]; Hagge, Chris [Chris.Hagge@meritenergy.com]
Subject: RE: Steamboat Butte - Class II Permit Modification Request

That works; please include the EPA contacts on the cc list to the meeting invitation.

--

Chris Brown, P.G.
Physical Scientist
U.S. EPA Region 8, UIC Section
8WD-SDU | 1595 Wynkoop Street | Denver, CO 80202
Office: (303) 312-6669

From: Lyles, Kat <Kat.Lyles@meritenergy.com>
Sent: Tuesday, December 13, 2022 4:13 PM
To: Brown, Christopher <Brown.Christopher.T@epa.gov>; Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Cc: Minter, Douglas <Minter.Douglas@epa.gov>; Bowling, Linda (she/her/hers) <Bowling.Linda@epa.gov>; Wiser, Nathan <Wiser.Nathan@epa.gov>; Wang, Gary <wang.gary@epa.gov>; Chin, Lucita <Chin.Lucita@epa.gov>; Hagge, Chris <Chris.Hagge@meritenergy.com>
Subject: RE: Steamboat Butte - Class II Permit Modification Request

That time works for Merit. Please let me know if you would like me to circulate a Teams invite. Thanks again!

From: Brown, Christopher <Brown.Christopher.T@epa.gov>
Sent: Tuesday, December 13, 2022 5:07 PM
To: Lyles, Kat <Kat.Lyles@meritenergy.com>; Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Cc: Minter, Douglas <Minter.Douglas@epa.gov>; Bowling, Linda (she/her/hers) <Bowling.Linda@epa.gov>; Wiser, Nathan <Wiser.Nathan@epa.gov>; Wang, Gary <wang.gary@epa.gov>; Chin, Lucita <Chin.Lucita@epa.gov>; Hagge, Chris <Chris.Hagge@meritenergy.com>
Subject: RE: Steamboat Butte - Class II Permit Modification Request

EXTERNAL EMAIL

Ms. Lyles,

Would 9:30-10:00 am MST Thursday (12/15) work for you and other Merit attendees? If not, I'll have to follow-up with additional times (possibly next week), as schedules look pretty booked this week.

--

Chris Brown, P.G.
Physical Scientist

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From: Lyles, Kat <Kat.Lyles@meritenergy.com>
Sent: Tuesday, December 13, 2022 12:26 PM
To: Brown, Christopher <Brown.Christopher.T@epa.gov>; Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Cc: Minter, Douglas <Minter.Douglas@epa.gov>; Bowling, Linda (she/her/hers) <Bowling.Linda@epa.gov>; Wiser, Nathan <Wiser.Nathan@epa.gov>; Wang, Gary <wang.gary@epa.gov>; Chin, Lucita <Chin.Lucita@epa.gov>; Hagge, Chris <Chris.Hagge@meritenergy.com>
Subject: RE: Steamboat Butte - Class II Permit Modification Request

We would like to take you up on your offer to schedule a meeting to discuss further. Please let me know if you have any availability this week.

Thank you,
Kat

From: Brown, Christopher <Brown.Christopher.T@epa.gov>
Sent: Tuesday, December 13, 2022 9:19 AM
To: Lyles, Kat <Kat.Lyles@meritenergy.com>; Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Cc: Minter, Douglas <Minter.Douglas@epa.gov>; Bowling, Linda (she/her/hers) <Bowling.Linda@epa.gov>; Wiser, Nathan <Wiser.Nathan@epa.gov>; Wang, Gary <wang.gary@epa.gov>; Chin, Lucita <Chin.Lucita@epa.gov>
Subject: RE: Steamboat Butte - Class II Permit Modification Request

EXTERNAL EMAIL

Ms. Lyles,

The request is to modify the permittee to reflect a transfer of operational control from Merit Energy Company to the Wind River Energy Commission. For reference and as outlined in 40 Code of Federal Regulations 144.41, any permit modification not processed as a minor modification under 40 CFR 144.41 must be made for cause and with a part 124 draft permit and public notice as required in § 144.39.

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Chris Brown, P.G.
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From: Lyles, Kat <Kat.Lyles@meritenergy.com>
Sent: Monday, December 12, 2022 12:49 PM
To: Brown, Christopher <Brown.Christopher.T@epa.gov>; Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>
Cc: Minter, Douglas <Minter.Douglas@epa.gov>; Bowling, Linda (she/her/hers) <Bowling.Linda@epa.gov>; Wiser,

Nathan <Wiser.Nathan@epa.gov>; Wang, Gary <wang.gary@epa.gov>; Chin, Lucita <Chin.Lucita@epa.gov>

Subject: RE: Steamboat Butte - Class II Permit Modification Request

Chris,

Thank you for the email. What is the nature of the modification?

From: Brown, Christopher <Brown.Christopher.T@epa.gov>

Sent: Monday, December 12, 2022 1:01 PM

To: Valliquette, Arlene <Arlene.Valliquette@meritenergy.com>

Cc: Lyles, Kat <Kat.Lyles@meritenergy.com>; Minter, Douglas <Minter.Douglas@epa.gov>; Bowling, Linda (she/her/hers) <Bowling.Linda@epa.gov>; Wiser, Nathan <Wiser.Nathan@epa.gov>; Wang, Gary <wang.gary@epa.gov>; Chin, Lucita <Chin.Lucita@epa.gov>

Subject: Steamboat Butte - Class II Permit Modification Request

EXTERNAL EMAIL

Ms. Valliquette,

The UIC Section has received a request to transfer permits by modification for Class II injection wells currently operated by Merit Energy Company (Merit) in the Steamboat Butte Field to the Wind River Energy Commission, and we are reviewing the request pursuant to provisions in 40 Code of Federal Regulations (CFR) 124.5 and 144.39. Following our November 15, 2022 conversation with Chad Brister, Kat Lyles, and Chris Heide, the UIC Section understands that Merit's lease to operate the Steamboat Butte Field expires on December 31, 2021, and that Merit may not have access to operate these wells after this date. The UIC Section also understands that, to date, Merit and WREC have been unable to negotiate a written agreement to facilitate transfer of the permits by minor modification pursuant to 144.41 or transfer of rule authorizations pursuant to 144.28(l).

Is there any update Merit can provide concerning its plans for the 23 permitted and 5 rule authorized Class II injection wells at the Steamboat Butte Field after December 31, 2022? Please provide any information that Merit would like the UIC Section to consider as we review this permit modification request.

Let me know if you have any questions or would like to set up a meeting to discuss further.

--

Chris Brown, P.G.

Physical Scientist

U.S. EPA Region 8, UIC Section

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